## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

| In re:              | Chapter 7               |
|---------------------|-------------------------|
| ALEXANDER E. JONES, | Case No. 22-33553 (CML) |
| Debtor.             |                         |

CERTIFICATE OF NO OBJECTION REGARDING
TRUSTEE'S EXPEDITED MOTION FOR ENTRY OF AN ORDER APPROVING
SETTLEMENT AMONGST THE TRUSTEE, PQPR HOLDINGS LIMITED LLC, DAVID
JONES, CAROL JONES, PLJR HOLDINGS LLC, AND JLJR HOLDINGS LLC PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019
[Relates to Dkt. No. 1005]

Christopher R. Murray in his capacity as Chapter 7 Trustee (the "Trustee") for the bankruptcy estate of Alexander E. Jones ("Alex Jones") files this Certificate of No Objection ("CNO") relating to the Trustee's Expedited Motion for Entry of an Order Approving Settlement Amongst the Trustee, PQPR Holdings Limited LLC, David Jones, Carol Jones, PLJR Holdings LLC, and JLJR Holdings LLC Pursuant to Federal Rule of Bankruptcy Procedure 9019 ("PQPR 9019 Motion")[Dkt. 1005].

- 1. On January 3, 2024, the Trustee for the bankruptcy estate of Alexander E. Jones ("**Estate**"), filed the PQPR 9019 Motion.
- 2. The Court set a deadline of 12:00 p.m. (CST) on January 21, 2025 (the "**Response Deadline**") to respond or object to the PQPR 9019 Motion.
  - 3. The Response Deadline has passed.
- 4. The undersigned represents to the Court that the Trustee is unaware of any objection or response to the PQPR 9019 Motion appearing on the Court's docket, that counsel to the Trustee has reviewed the docket, and no party has filed an objection or response to the relief sought in the PQPR 9019 Motion.
- 5. Attached hereto is the proposed order approving the PQPR 9019 Motion (the "**Proposed Order**").
  - 6. The Trustee respectfully requests that the Court enter the Proposed Order.

Dated: January 21, 2025.

## Respectfully submitted, **PORTER HEDGES LLP**

By: /s/ Erin E. Jones
Erin E. Jones
Texas Bar No. 24032478
Jones Murray LLP
602 Sawyer Suite 400
Houston, Tx 77007
Telephone 832-529-1999
erin@jonesmurray.com

## and

Joshua W. Wolfshohl; TX Bar No. 24038592
Michael B. Dearman; TX Bar No. 24116270
Jordan T. Stevens; TX Bar No. 24106467
Kenesha L. Starling; TX Bar No. 24114906
Texas Bar No. 24038592
1000 Main Street, 36<sup>th</sup> Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 228-1331
jwolfshohl@porterhedges.com
mdearman@porterhedges.com
jstevens@porterhedges.com
kstarling@porterhedges.com

COUNSEL TO CHRISTOPHER R. MURRAY, CHAPTER 7 TRUSTEE

## **CERTIFICATE OF SERVICE**

I certify that on January 21, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

/s/ Erin E. Jones
Erin E. Jones